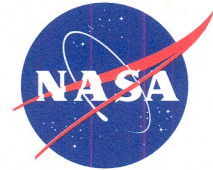


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



September 2, 2011

General Law Practice Group

Reply to Attn of:

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA employees at the L'OREAL USA Fellowships For Women in Science Awards Luncheon hosted by L'OREAL USA September 15, 2011

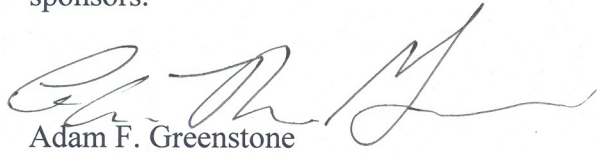
On September 15, 2011, L'OREAL USA is sponsoring an awards luncheon for women in science. The lunch will be held from Noon – 2 PM in the Kennedy Caucus Room 325, in the Russell Senate Office Building, in Washington, D.C. This event will provide NASA employees an opportunity to discuss the mission and other NASA programs with representatives of the communities.

Approximately 150 people are expected to attend this luncheon. Expected attendees include Members of Congress and legislative staff, state and local officials, academia, and other members of the public. The luncheon will include hor d' oeuvres and refreshments valued at approximately \$70 per person. In accordance with 5 C.F.R. § 2635.204(g), and 14 C.F.R. § 1207.103, I find that the event meets the definition of a “widely attended gathering.” I further find that there is an agency interest in having NASA employees attend the event, as they will have the opportunity to further agency programs and operations through the exchange of views and information with other attendees.

Accordingly, NASA employees who have been invited to attend may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests. However, NASA employees whose duties may substantially affect the sponsor such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor. Moreover, NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 may accept free attendance at the event.

We understand that L'Oreal will be distributing a USB with information for the event. Attendees are reminded of the \$20 gift exception at 5 C.F.R. § 2635.204(a) which provides that employees may accept gifts valued at no more than \$20 per occasion and no more than \$50 from one source in a calendar year. Other than for presentation items with little intrinsic value and no additional function, such as pins or patches with mission emblems, NASA invitees must

reimburse the sponsor for full value of any gift items exceeding these caps distributed by the sponsors.

A handwritten signature in black ink, appearing to read 'Adam F. Greenstone', with a long, sweeping horizontal line extending to the right.

Adam F. Greenstone